

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**NEW INDUSTRIES, INC. / MORGAN CITY YARD**  
**PROPOSED STATE AIR OPERATING PERMIT MODIFICATION**

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed state air operating permit modification for New Industries, Inc., P.O Box 2176, Morgan City, Louisiana 70381 for the Morgan City Yard. **The facility is located at 6032 Railroad Avenue, Morgan City, St. Mary Parish.**

New Industries, Inc., is a coating facility located in St. Mary Parish. The facility's areas include sandblasting and painting. The equipment received will be cleaned, sandblasted, and painted as per the customer requirements. The facility currently operates under Permit No. 2660-00232-00, issued January 28, 2000.

New Industries, Inc. requested the following changes to allow for an increase in emission rates due to an increase in production rates and to establish an emissions cap on the TAP emissions to allow for operational flexibility.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	4.87	12.44	+7.57
SO <sub>2</sub>	0.18	1.15	+0.97
NO <sub>x</sub>	2.91	17.86	+14.95
CO	1.15	3.82	+2.67
VOC	1.98	15.90	+13.92

Toxic compounds include the following compounds whose change is above the Minimum Emission Rate (MER) listed in LAC 33:III.Chapter 51.Table 51.1: Barium (and compounds), n-Butyl alcohol, Naphthalene (and Methyl-naphthalenes), Trichloroethylene, Zinc (and compounds), Chromium VI (and compounds), Nickel (and compounds), and Manganese (and compounds).

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Wednesday, March 26, 2008.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application and proposed state air operating permit modification are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy may be reviewed at Morgan City Public Library, 230 Everett Street, Morgan City, LA.

Inquiries or requests for additional information regarding this permit action should be directed to Shannon Pusateri, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3048.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the proposed permit** can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 30604, Permit Number 2660-00232-01, and Activity Number PER20020001.**

**Publication date: February 22, 2008**

# NEW INDUSTRIES

PRESSURE VESSELS - PIPING  
STRUCTURAL STEEL

# COPY

original to T.O.A.  
copy to MEG/Gy2/S. Puotari  
PER 20020001

October 19, 2007

Chuck Carr Brown, Ph.D.  
Assistant Secretary  
DEQ Office of Environmental Services  
P.O. Box 4313  
Baton Rouge, LA 70821-4313

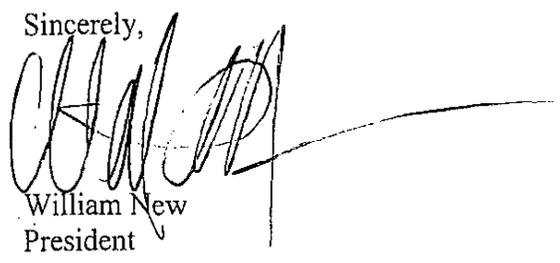
Re: New Industries, Inc.  
Air Permit Application  
AI: 30604

Dear Dr. Brown,

In response to our compliance order issued September 25, 2007, we are submitting an updated air permit application for our Morgan City yard. Per our estimations, we are a small source facility; as such, we are not subject to any MACT standards.

If you have any questions, please feel free to contact me at 985-385-6789. Your expedited approval of this application is much appreciated.

Sincerely,

  
William New  
President

2007 OCT 26 PM 3:15

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APPLICATION FOR APPROVAL  
OF EMISSIONS AND  
EMISSION INVENTORY  
QUESTIONNAIRE

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New Industries, Inc.  
Morgan City, LA

October 2007

2007 OCT 25 PM 3:15  
5-14-07 2:13



ENVIRO-SENSE, INC.

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**New Industries, Inc.  
Morgan City, LA  
Air Permit Application**

***Introduction***

New Industries, Inc. is located at 6032 Railroad Ave. in Morgan City, in St. Mary Parish. Maps of the facility are located in Appendix A. This is an updated modification application for this facility; the original application was submitted in 2002. This facility has experienced an increase in production in the past few years. However, even with this anticipated increase, this facility will remain a small source of air emissions.

There are five emissions sources that were submitted on the original application which are no longer at the site: 6-99, 7-99, 8-99, 9-99, 11-99 and 12-99. These sources were all either diesel air compressors or welding machines.

***Process Description***

New Industries sandblasts and paints equipment per customer specifications. Air emissions generated are typically from painting, general solvent use, and sandblasting. These activities occur in vented warehouses and outdoors. As such, they are all area sources.

New Industries requests to be permitted to use 9,085 gallons of paints and solvent per year and 1,200 tons of sand per year. Material Safety Data Sheets for some of the materials listed above are in Appendix B.

***Control Equipment***

Since all emission sources are fugitive, there is no process control equipment at the facility. All emission reductions are achieved through work practice standards and material selection. New Industries uses low VOC paints when available and encourages employees to use good housekeeping practices. The housekeeping plan can be found in Appendix D.

***Insignificant Activities***

This facility has a 500 gallon diesel tank and a 250 gallon portable diesel tank. The vapor pressure of diesel is less than 0.5 psia. As such, this tank is an insignificant source of emissions.



**Emission Summary**

Pollutant	Current Permit Limit (tpy)	Proposed Permit Limit (tpy)
PM <sub>10</sub>	4.87	12.44
NO <sub>x</sub>	2.91	17.86
CO	1.15	3.82
SO <sub>x</sub>	0.18	1.15
VOC	1.98	15.90
Total TAPs		6.42

The paint, thinner, and solvent air emissions were calculated using material balances on each product, utilizing the manufacturer's data on each. A one hundred percent evaporation rate was assumed for the volatile constituents. A material balance on the solid constituents, accounting for transfer and containment efficiencies, was used for the solids in the paint.

The sandblasting emissions were estimated using CARB emission factors for abrasive blasting. Containment efficiencies were applied on top of the factors.

Please see Appendix C for a spreadsheet of the calculations

**Requested Specific Conditions**

Much of New Industries' work is dictated by their client's specifications. Every effort was made to accurately account for the air emissions at this site. However, the paints, thinner, and solvents used at the site are subject to change with each job. As such, flexible permit limits are being requested to keep the company competitive while ensuring compliance with applicable state and federal regulations. Section 925 of LAC33.III states that a facility may propose a mass emission rate for any pollutant equal to the sum of all sources within a facility for approval by the administrative authority. The facility will set emission rates for each proposed source within the facility that when accumulated will demonstrate compliance with the mass emission rate. As such, CCS proposes the following for the paints, thinners, and solvents:

1. Facility will abide by the limits set in LAC33.III.2123.C-11.
2. Facility will use no more than 7,285 gallons of paint and thinner, and 1,800 gallons of solvent each year. Usage of each will be recorded each month.
3. VOC emissions from paints, thinners, and solvents use will not exceed 15 tpy; total TAP emissions from paints, thinners, and solvents will not exceed 6.5 tpy. VOC and TAP emissions will be calculated monthly.
4. The facility shall use materials which contain only the TAPs listed in the following table.



Pollutant	CAS No.	Class	Requested Emission Rate (tpy)
Barium (and compounds)	7440-39-3	II	< 1
Benzene	71-43-2	I	<0.1
n-Butanol	71-36-3	III	<5.5
Ethylbenzene	100-41-4	II	<9
Formaldehyde	50-00-0	I	<0.1
Glycol Ethers	109-86-4	II	<0.5
HDI Isocyanate	822-06-0	III	< 1
n-Hexane	110-54-3	III	<6.5
Methanol	67-56-1	III	<9
MEK	78-93-3	III	<9
MIBK	108-10-1	III	<7.5
Naphthalene	91-20-3	II	< 1
Phenol	108-95-2	II	<0.7
Styrene	100-42-5	II	< 1
Toluene	108-88-3	III	<9
Trichloroethylene	79-01-6	II	< 1
Xylene	1330-20-7	II	<9
Zinc	7440-66-6	II	< 1
<b>Total TAP</b>			<b>6.5</b>

### MACT

This facility is a minor source of air emissions. Hence, it is not subject to either the Louisiana Shipbuilding MACT or to Part 63 Subpart Mmmm.



# APPLICATION TRANSMITTAL FORM

State Agency: Department of Environmental Quality Date: October 23, 2007  
Please submit two copies of this form with the application.

## PART A Administrative Information

Facility Name: New Industries, Inc.  
City: Morgan City Parish: St. Mary  
State: LA Zip: 70380 Telephone: 985-631-9735

Facility Contact Person: James Stewart  
Facility Mailing Address: P.O. Box 2176  
Morgan City, LA  
70381

State Permit Number: \_\_\_\_\_ Primary SIC Code: 3479  
Secondary SIC Code(s): \_\_\_\_\_

Place an X under the appropriate description:

<u>New Permit</u>	<u>Renewal</u>	<u>Major/Significant</u>	<u>Minor</u>	<u>Supplemental Information</u>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## PART B Technical Information

Place an X next to the appropriate information:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> CO Source         | <input checked="" type="checkbox"/> NOx Source |
| <input checked="" type="checkbox"/> PM10 Source       | <input checked="" type="checkbox"/> SO2 Source |
| <input checked="" type="checkbox"/> VOC Source        | <input type="checkbox"/> Lead Source           |
| <input checked="" type="checkbox"/> 112(b) Pollutants | <input type="checkbox"/> BIF Facility          |
| <input type="checkbox"/> PSD Source                   | <input type="checkbox"/> Compliance Schedule   |
| <input type="checkbox"/> Nonattainment Area           | <input type="checkbox"/> Federal Facility      |
| <input type="checkbox"/> Acid Rain Source             | <input type="checkbox"/> General Permit Source |
| <input type="checkbox"/> Chlorofluorocarbons          | <input type="checkbox"/> Combustion Source     |

Number of units subject to Enhanced Monitoring (Part 64)? None

Within 50 miles of Class I area? NO

Within 50 miles of Indian country? NO

Applicable Part 60 NSPS subpart? (please list) N/A

Applicable Part 61 NESHAP subpart? (please list) N/A

Applicable Part 63 MACT category? (please list) N/A

Case by case MACT? N/A

Distance to nearest Class I Area Greater than 100 Miles.

***Application***

Department of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219 - 3181	<h2 style="margin: 0;">LOUISIANA</h2> <h3 style="margin: 0;">Application for Approval of Emissions of Air Pollutants</h3>
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Please type or print	Company Name <b>New Industries, Inc.</b>	<input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator	For Permit Division Use Only
	Parent Company (if Company Name given above is a division)		
	Plant Name		
	Nearest Town <b>Morgan City</b>	Parish <b>St. Mary</b>	
Agency Interest Number <b>30604</b>		CDS Number <b>2660-00232</b>	

**2. PROPOSED ACTION** Give a brief description of proposed action. Attach flow diagrams, illustrations required to convey an understanding

Update the pending permit application for this facility. The company has experienced much growth during the past years and wished to modify their current air permit to increase air emissions.

**3. OWNERSHIP AND USE OF ADJOINING PROPERTY**  Map or description attached.

Distance to (km):	Texas:	Arkansas:	Mississippi:	Alabama:
Latitude of Facility Front Gate:	29° 41' 21"			
Longitude of Facility Front Gate:	91° 10' 14"			

This facility is located at 6032 Railroad Avenue in Morgan City. It is located in a commercial/industrial area. The facility is surrounded by residences to the North, over the levee, Bayou Beouf to the South, Delta Steel to the East, and Hudson Drydocks to the West.

**4. TYPE OF APPLICATION**

<input type="checkbox"/> Part 70	<input checked="" type="checkbox"/> State	<input type="checkbox"/> General	<input type="checkbox"/> Renewal (Part 70)
<input type="checkbox"/> Entirely New Facility	<input type="checkbox"/> Reconciliation	<input checked="" type="checkbox"/> Modification or expansion of existing facility	
<input type="checkbox"/> Previously grandfathered, exempted, or unpermitted			

Project fee calculation: Enter fee number, permit type, production capacity/thruput, and fee amount pursuant to LAC 33:III.Chap.2

Fee No.	Type	Capacity	Amount
1722	Small Source Permit Modification		\$428.00

**5. KEY DATES**

Estimated Date construction will commence: \_\_\_\_\_ Estimated Date operation will commence: \_\_\_\_\_

NOTE: A completed Emission Inventory Questionnaire (EIQ) that reflects projected emissions from your facility as a whole after the project described in this application becomes operational must be submitted with this application. If you are submitting an application that is for modification or expansion of an existing facility, the Department of Environmental Quality must also have an EIQ for existing emissions. If you have already submitted an EIQ that is on file with the Department, it may fulfill this requirement.





**EMISSION POINT LIST**

**New Industries, Inc.  
Morgan City, St. Mary Parish**

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			Hours Day	Days Week	Weeks Year
1-99	Paint and Thinner Emissions	7285 Gal/Yr	12	5	52
2-99	Solvent Emissions	1800 Gal/Yr	12	5	52
3-99	Sandblasting Emissions	1200 tons/yr	12	5	52
4-99	Diesel Air Compressor	230 hp	12	52	52
5-99	Diesel Air Compressor	70 hp	12	5	52
6-99	Diesel Air Compressor				
7-99	Diesel Welding Machine				
8-99	Diesel Welding Machine				
9-99	Diesel Welding Machine				
10-99	Diesel Welding Machine	60 hp	4	5	50
11-99	Diesel Welding Machine				
12-99	Diesel Welding Machine				
13-99	Welding & Cutting Emissions		12	5	52
14-99	Diesel Air Compressor	109 hp	12	5	52

Insignificant Activities List					
	Diesel Tank	500 gal	24	7	52
	Diesel Tank	250 gal	24	7	52

**8. Title VI Stratospheric Ozone**

- A. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances?  X  Yes   No
- B. Does the air conditioner or refrigeration equipment contain a refrigeration charge greater than 100 pounds?   Yes  X  No
- C. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances?   Yes  X  No
- D. Cite and describe which Title VI requirements are applicable to your facility in the Regulatory Applicability section of the application.

**9. LAC 33:11701 Requirements**

- A. Does the company or owner have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying in other states?
  - Permits in Louisiana. List permit numbers:  No
  - Permits in other states (list states):  No
- B. Do you owe any outstanding fees or final penalties to the Department?
  - Yes  No

If yes, please explain. \_\_\_\_\_

- C. Is your company a corporation or limited liability company?  Yes  No

If yes, attach a copy of your company's Certification of Registration and/or Certificate of Good Standing from the Secretary of State.

**10. EMISSION POINT LIST AND ANNUAL EMISSION RATE TABLE**

Complete the following Emission Point List with the emission point number and description for each emission point. Include also, the associated operating rate or tank capacity and the operating schedule. List all Insignificant Activities under the appropriate heading. For sources claimed to be insignificant based on size or emission rate (LAC 33:III.501.B.5.A), information must be supplied to verify each claim.

Complete the following Annual Emission Rate Table by emission point ID or identifier with the annual emission rates for each appropriate pollutant. Include speciation data as available. Calculate totals for each pollutant and speciation data. List all General Condition XVII Activities under the appropriate heading. Emissions must be listed for each activity. Do not include emissions from General Condition XVII Activities in the totals.

**11. APPLICABLE REGULATIONS, AIR POLLUTION CONTROL MEASURES, MONITORING, AND RECORD KEEPING**

List in the following Tables 1-5, by emission point ID or identifier, state and federal pollution abatement programs and describe how compliance with these programs will be achieved, including test methods that will be used.

**New Industries, Inc.  
Morgan City, St. Mary Parish**

Emission Point No.	Permitted emission rates are listed in tons per year					Other
	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC*	
1-99	1.60				10.72	
2-99					3.75	
3-99	7.80					
4-99	0.66	0.61	9.27	2.00	0.75	
5-99	0.20	0.19	2.82	0.61	0.23	
6-99						
7-99						
8-99						
9-99						
10-99	0.07	0.06	0.93	0.20	0.08	
11-99						
12-99						
13-99	1.80	0.00	0.45	0.06	0.01	
14-99	0.31	0.29	4.39	0.95	0.36	
<b>TOTALS:</b>	<u>12.44</u>	<u>1.15</u>	<u>17.86</u>	<u>3.82</u>	<u>15.90</u>	

\*VOC TAP Speciation:

Xylene	3.964	TPY
Toluene	0.094	TPY
Ethylbenzene	0.832	TPY
MIBK	0.170	TPY
Methanol	0.250	TPY
Butanol	0.817	TPY
HDI isocyanate	0.023	TPY
<b>TOTALS:</b>	<u>6.15</u>	<b>TPY</b>

\*Other VOC:

non-VOC TAP Speciation:

Zinc	0.168	TPY
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General Condition XVII Activities List:











**10. COMPLIANCE WITH FEDERAL REQUIREMENTS**

**Statement for Applicable Requirements for Which the Source is in Compliance**

Based on the information and belief, formed after reasonable inquiry, the company and facility referenced in this application is in compliance with and will continue to comply with all applicable requirements pertaining to the sources covered by the permit application, as outlined in Tables 1 and 2 in the permit application.

For requirements promulgated as of the date of this certification with compliance dates effected during the permit terms, I further certify that the company and facility referenced in this application will comply with such requirements on a timely basis and will continue to comply with such requirements.

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Application for Approval of Emissions of Air Pollutants, including all attachments thereto, are truly accurate and complete.

CERTIFICATION: I certify that the engineering calculations, drawings, and design are true and accurate to the best of my knowledge.

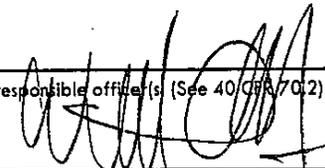
**11. PERSONNEL**

**a. Responsible Officer**

Name	William New		
Title	President		
Company	New Industries, Inc.		
Suite, Mail Drop, or Division			
Street or P.O. Box	P.O. Box 2176		
City	Morgan City	State	LA Zip 70381
Business Phone	985-385-6789		

**b. Professional Engineer**

Name	Leah Roger		
Title	President		
Company	Enviro-Sense, Inc.		
Suite, Mail Drop, or Division			
Street or P.O. Box	609 South State Street		
City	Abbeville	State	LA Zip 70510
Business Phone	337-898-2823		

Signature of responsible officer(s) (See 40 CFR 70.2)			
Date	10/22/07		
Date			

Signature of Professional Engineer	
Date	
Registration No.	State of Registration

Department of Environmental Quality  
 Office of Environmental Services  
 P.O. Box 4313  
 Baton Rouge, LA 70821-4313  
 (225) 219 - 3181

# LOUISIANA

## Emission Inventory Questionnaire (EIQ) for Air Pollutants

<b>1</b>	Company Name <b>New Industries, Inc.</b>	<input type="checkbox"/> Owner	<b>For Permit Division Use Only</b>
	Parent Company (if Company Name given above is a division)	<input checked="" type="checkbox"/> Operator	
	Plant Name		
	Nearest Town <b>Morgan City</b>	Parish <b>St. Mary</b>	
	Agency Interest Number <b>30604</b>	CDS Number <b>2660-00232</b>	

**2. TYPE OF EIQ**

a. ONLY presently existing emissions

b. BOTH proposed additional emissions associated with an emission application for a permit, variance, or exemption AND presently existing emissions expected to be still existing after facility or modification described in application becomes operational

**3. CONFIDENTIALITY**

If you are requesting confidentiality for all information, except air pollutant emission rates, check box.

(You must attach justification for confidentiality request)

**4. ORGANIZATIONAL ACTIVITIES**

Days of week normally NOT operating:  Mon  Tue  Wed  Thu  Fri  Sat  Sun

Days per year facility typically operates: 312

Peak Production season (list months): \_\_\_\_\_

Daily operating schedule:  24 hours OR specify number of hours: 20

Approximate number of employees at this location: 70

Details of facilities that, as a whole, operate intermittently: \_\_\_\_\_

**Ownership:**

corporation, partnership, or sole proprietorship  regulated utility  municipal government

state government  federal government  other, specify: \_\_\_\_\_

**Industrial category - indicate Standard Industrial Classification (SIC) Code(s) that apply to your facility:**

3479

Description of operation with emphasis on air pollution sources. Use attachments if more space is needed.

This facility fabricates equipment used by the oil and gas industry. Sources of emissions include painting, general solvent use, and sandblasting. Facility also uses diesel air compressors and welding machines.

Insignificant activities include a 500 gallon diesel tank.



**6. PERSONNEL**

**a. Manager of facility on location at plant site**

Name	William New		
Title	President		
Company	New Industries, Inc.		
Suite, Mail Drop, or Division			
Street or P.O. Box	P.O. Box 2176		
City	Morgan City	State	LA Zip 70381
Business Phone	985-385-6789		

**b. Contact at site about air pollution control**

Name	James Stewart		
Title	Vice President		
Company	New Industries, Inc.		
Suite, Mail Drop, or Division			
Street or P.O. Box	P.O. Box 2176		
City	Morgan City	State	LA Zip 70381
Business Phone	985-385-6789		

**c. Headquarters or other off-site contact**

Name			
Title			
Company			
Suite, Mail Drop, or Division			
Street or P.O. Box			
City		State	Zip
Business Phone			

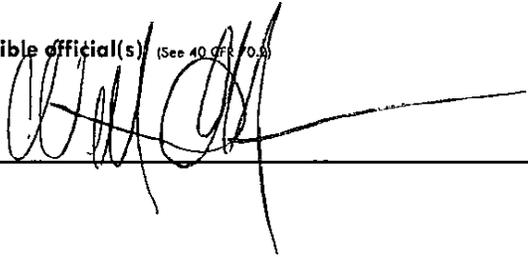
**d. Person who prepared this report**

a.       b.       c.       other

Name	Leah Roger		
Title	President		
Company	Enviro-Sense, Inc.		
Suite, Mail Drop, or Division			
Street or P.O. Box	609 South State Street		
City	Abbeville	State	LA Zip 70510
Business Phone	337-898-2823		

CERTIFICATION: I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Emission Inventory Questionnaire (EIQ) for Air Pollutants, including all attachments thereto, are true, accurate, and complete.

Signature of responsible official(s) (See 40 CFR 70.6)



Date

10/22/07

# LOUISIANA

## SINGLE POINT/AREA/VOLUME SOURCE Emission Inventory Questionnaire (EIQ)

for Air Pollutants

Department of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3181		<b>Plant location and name</b> New Industries, Inc. 6032 Railroad Ave., Morgan City		Date of Submittal <b>October 23, 2007</b>	
Source ID Number <b>1-99</b>		Descriptive name of the equipment served by this stack or vent <b>Paint and Thinner Emissions</b>			
Approximate location of stack or vent UTM Zone no. <input checked="" type="checkbox"/> 15 <input type="checkbox"/> 16 Horizontal Coordinate: <b>677006 mE</b> Vertical Coordinate: <b>3285731 mN</b>		Operating Rate (Max) or tank capacity <b>7285 Gal/Yr</b>			
Stack and Discharge Physical Characteristics <input type="checkbox"/> Changed		Stack Gas Exit Temperature (°F)		Stack gas flow at process conditions (ft <sup>3</sup> /min)	
Diameter (ft) or stack discharge area (ft <sup>2</sup> ) <input type="radio"/> ft <input checked="" type="radio"/> ft <sup>2</sup>		Stack Gas Exit Temperature (°F)		Stack gas exit Velocity (ft/sec)	
Type of fuel used and heat input (See Instructions) Type of Fuel Heat Input (MMBTU/hr)		Operating Characteristics		Percent of annual throughput of pollutants through this emission point	
Fuel a b c		Characteristics		Dec-Feb: <b>25%</b> Mar-May: <b>25%</b> Jun-Aug: <b>25%</b> Sep-Nov: <b>25%</b>	
		Normal operating time of this point hrs/day: <b>12</b> days/wk: <b>5</b> wk/yr: <b>52</b>		Operating Rate <b>7285 Gal/Yr</b>	

Air Pollutant Specific Information						
Pollutant	Control Equipment		Emission Rates			Emission Method
	Code	Efficiency	Average (lbs/hr)	Maximum (lbs/hr)	Annual (ton/yr)	
Particulate Matter (PM <sub>10</sub> )			1.03	1.03	1.60	2
Zinc			0.11	0.11	0.17	2
Sulfur Dioxide (SO <sub>2</sub> )						
Nitrogen Dioxide (NO <sub>x</sub> )						
Carbon Monoxide (CO)						
Total VOC (including those listed below)						
Xylene			6.87	6.87	10.72	2
Toluene			2.34	2.34	3.65	2
Ethylbenzene			0.02	0.02	0.03	2
MIBK			0.45	0.45	0.71	2
Methanol			0.01	0.01	0.01	2
Butanol			0.16	0.16	0.25	2
HDI Isocyanate			0.52	0.52	0.82	2
			0.01	0.01	0.02	2

<h1 style="margin: 0;">LOUISIANA</h1> <p style="margin: 0;"><b>SINGLE POINT/AREA/VOLUME SOURCE</b> Emission Inventory Questionnaire (EQ) for Air Pollutants</p>		Date of Submittal <b>October 23, 2007</b>	
Department of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219 - 3181		Plant location and name <b>New Industries, Inc.</b> 6032 Railroad Ave., Morgan City	
Source ID Number <b>2-99</b>		Descriptive name of the equipment served by this stack or vent Approximate location of stack or vent UTM Zone no. <input checked="" type="checkbox"/> 15 Horizontal Coordinate: <b>677006 mE</b> Vertical Coordinate: <b>3285731 mN</b>	
<b>Solvent Emissions</b>			
Stack and Discharge Physical Characteristics <input type="checkbox"/> Changed	Stack Height (ft) above grade Diameter (ft) or stack discharge area (ft <sup>2</sup> ) <input type="radio"/> ft <input checked="" type="radio"/> ft <sup>2</sup>	Stack Gas Exit Temperature (°F) Stack gas flow at process conditions (ft <sup>3</sup> /min) Stack gas exit Velocity (ft/sec) <input checked="" type="checkbox"/> 15 <input type="checkbox"/> 16	Date of Construction/Modification Operating Rate (Max) or tank capacity <b>1800 Gal/Yr</b>
<b>Operating Characteristics</b>			
Type of fuel used and heat input (See Instructions) Type of Fuel Heat Input (MMBTU/hr)		Percent of annual throughput of pollutants through this emission point Normal operating time of this point Operating Rate	
a b c		Dec-Feb: <b>25%</b> Mar-May: <b>25%</b> Jun-Aug: <b>25%</b> Sep-Nov: <b>25%</b> hrs/day: <b>12</b> days/wk: <b>5</b> wk/yr: <b>52</b>	
<b>Air Pollutant Specific Information</b>			
<b>Pollutant</b>		<b>Emission Rates</b>	
Control Equipment		Emission Method	
Code	Efficiency	Annual (ton/yr)	Add, Change, or Delete Code
Average (lbs/hr)	Maximum (lbs/hr)	Concentration in gases exiting at stack	
Particulate Matter (PM <sub>10</sub> )		g/100 ft <sup>3</sup>	
Sulfur Dioxide (SO <sub>2</sub> )		ppm by vol	
Nitrogen Dioxide (NO <sub>x</sub> )		ppm by vol	
Carbon Monoxide (CO)		ppm by vol	
Total VOC (including those listed below)		ppm by vol	
Xylene		ppm by vol	
Toluene		ppm by vol	
Ethylbenzene		ppm by vol	
MIBK		ppm by vol	





# LOUISIANA

## SINGLE POINT/AREA/VOLUME SOURCE Emission Inventory Questionnaire (EIQ) for Air Pollutants

Department of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219 - 3181		<b>New Industries, Inc.</b> Plant location and name <b>6032 Railroad Ave., Morgan City</b>		Date of Submittal <b>October 23, 2007</b>	
Source ID Number <b>5-99</b>		Descriptive name of the equipment served by this stack or vent <b>Diesel Air Compressor</b>			
Approximate location of stack or vent UTM Zone no. <input checked="" type="checkbox"/> 15 <input type="checkbox"/> 16 Horizontal Coordinate: <b>677006 mE</b> Vertical Coordinate: <b>3285731 mN</b>		Stack gas flow at process conditions (ft <sup>3</sup> /min)		Stack gas exit Velocity (ft/sec) <input type="checkbox"/> 15 <input type="checkbox"/> 16	
Operating Rate (Max) or tank capacity <b>70 hp</b>		Normal operating time of this point days/wk <b>5</b>		Operating Rate <b>70 hp</b>	
Stack and Discharge Physical Characteristics <input type="checkbox"/> Changed		Diameter (ft) or stack discharge area (ft <sup>2</sup> ) ft <input checked="" type="radio"/> ft <sup>2</sup> <input type="radio"/>		Date of Construction/Modification	
Stack Height (ft) above grade <b>7</b>		Stack Gas Exit Temperature (°F) <b>0.208333</b>		Normal operating time of this point hrs/day <b>12</b>	
Type of fuel used and heat input (See instructions) Heat input (MMBTU/hr)		Percent of annual throughput of pollutants through this emission point		Normal operating time of this point wk/yr <b>52</b>	
Type of Fuel Diesel		Dec-Feb <b>25%</b>		Mar-May <b>25%</b>	
a		Jun-Aug <b>25%</b>		Sep-Nov <b>25%</b>	
b		Annual (ton/yr)		Add, Change, or Delete Code	
c		Maximum (lbs/hr)		Emission Estimation Method	
Average (lbs/hr)		Annual (ton/yr)		Concentration in gases exiting at stack	
Efficiency		Average (lbs/hr)		or/nd ft <sup>3</sup>	
Code		Maximum (lbs/hr)		ppm by vol	
Control Equipment		Average (lbs/hr)		ppm by vol	
Code		Maximum (lbs/hr)		ppm by vol	
Efficiency		Average (lbs/hr)		ppm by vol	
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Efficiency		Average (lbs/hr)		ppm by vol	
Code		Maximum (lbs/hr)		ppm by vol	
Efficiency		Average (lbs/hr)		ppm by vol	











# LOUISIANA

## SINGLE POINT/AREA/VOLUME SOURCE Emission Inventory Questionnaire (EIQ) for Air Pollutants

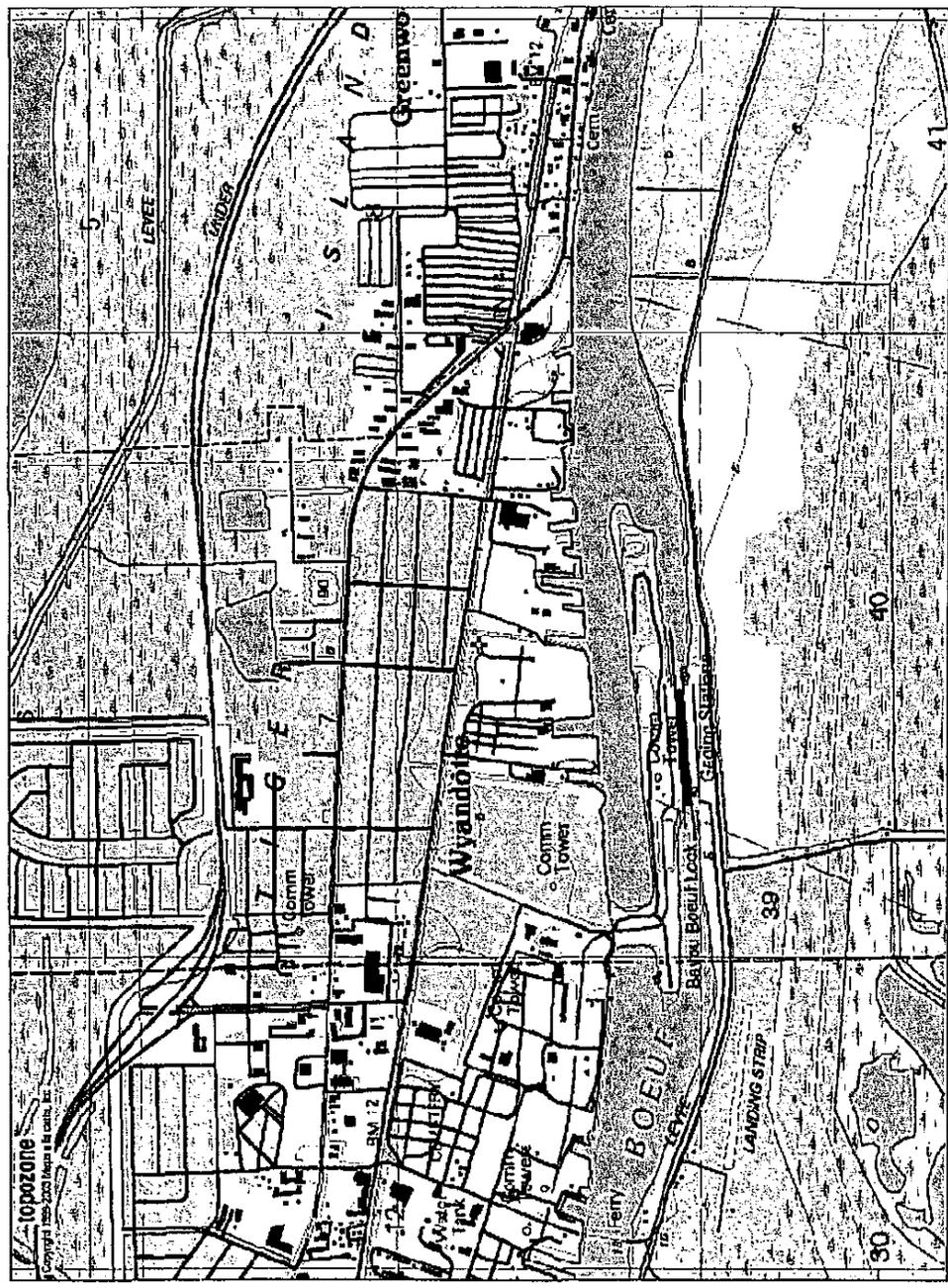
Department of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3181		<b>New Industries, Inc.</b> Descriptive name of the equipment served by this stack or vent <b>6032 Railroad Ave., Morgan City</b>		Plant location and name <b>6032 Railroad Ave., Morgan City</b>		Date of Submittal <b>October 23, 2007</b>	
Source ID Number <b>11-99</b>		Approximate location of stack or vent UTM Zone no. <input checked="" type="checkbox"/> 15 <input type="checkbox"/> 16 Horizontal Coordinate: <b>677006 mE</b> Vertical Coordinate: <b>3285731 mN</b>		Operating Rate (Max) or tank capacity <b>Normal</b>			
Stack and Discharge Physical Characteristics <input type="checkbox"/> Changed		Diesel Welding Machine Stack gas flow at process conditions (ft <sup>3</sup> /min)		Stack gas exit Velocity (ft/sec) <input checked="" type="checkbox"/> 15 <input type="checkbox"/> 16		Date of Construction/Modification	
Diameter (ft) or stack discharge area (ft <sup>2</sup> ) <input checked="" type="radio"/> ft <input type="radio"/> ft <sup>2</sup>		Stack Gas Exit Temperature (°F)		Percent of annual throughput of pollutants through this emission point Dec-Feb: <b>25%</b> Mar-May: <b>25%</b> Jun-Aug: <b>25%</b> Sep-Nov: <b>25%</b>		Normal operating time of this point hrs/day    days/wk    wk/yr	
Type of fuel used and heat input (See Instructions) Type of Fuel    Heat Input (MMBTU/hr)		Operating Characteristics		Add, Change, or Delete Code		Concentration in gases exiting at stack	
Fuel a b c		Average (lbs/hr)    Maximum (lbs/hr)    Annual (ton/yr)		Emission Estimation Method		gr/std ft <sup>3</sup> ppm by vol ppm by vol	
Control Equipment Code    Efficiency		Emission Rates		Emission		Delete Delete Delete Delete Delete	
Pollutant Particulate Matter (PM <sub>10</sub> ) Sulfur Dioxide (SO <sub>2</sub> ) Nitrogen Dioxide (NO <sub>x</sub> ) Carbon Monoxide (CO) Total VOC (including those listed below)		Annual (ton/yr)		Emission Method		Delete Delete Delete Delete Delete	

### Air Pollutant Specific Information









Morgan City

New Industries, Inc.



**Appendix C**  
**Emission Calculations**

**New Industries  
Morgan City, LA  
Air Emission Estimations**

**PAINT PARTICULATE EMISSIONS**

A 3% loss of paint due to overspray was assumed based upon the transfer efficiency of the spray guns, the containment efficiency, and the size of the yard. The total weight of paint sprayed with 53.66 tons; the particulate releases are assumed to be 1.6 tpy.

**SANDBLASTING EMISSIONS**

Sandblasting is done outdoors within a screened area anytime during a 12 hour period per day, five days per week.

annual amount sand used: 1200 tons  
 containment efficiency: 50 %  
 emission factor: 26 lb/ton sand blasted \*

PM<sub>10</sub>: 7.8 tons/yr  
 6.00 lb/hr

**DIESEL ENGINE EMISSIONS**

One 230 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	230 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
<b>Pollutant</b>	<b>AP-42</b>	<b>Total Emitted</b>		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	1315.60	0.66	0.51
SO <sub>x</sub>	0.00205	1225.90	0.61	0.47
NO <sub>x</sub>	0.031	18538.00	9.27	7.13
CO	0.00668	3994.64	2.00	1.54
TOC	0.0025141	1503.43	0.75	0.58

One rental 109 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	109 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
<b>Pollutant</b>	<b>AP-42</b>	<b>Total Emitted</b>		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	623.48	0.31	0.24
SO <sub>x</sub>	0.00205	580.97	0.29	0.22
NO <sub>x</sub>	0.031	8785.40	4.39	3.38
CO	0.00668	1893.11	0.95	0.73
TOC	0.0025141	712.50	0.36	0.27



One rental 70 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	70 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
Pollutant	AP-42	Total Emitted		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	400.40	0.20	0.15
SO <sub>x</sub>	0.00205	373.10	0.19	0.14
NO <sub>x</sub>	0.031	5642.00	2.82	2.17
CO	0.00668	1215.76	0.61	0.47
TOC	0.0025141	457.57	0.23	0.18

One 60 hp welding machine will be used 1000 hours per year on average.

horsepower rating compressor:	60 hp			
annual operation:	1000 hours			
emission factors:	AP-42			
Pollutant	AP-42	Total Emitted		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	132.00	0.07	0.13
SO <sub>x</sub>	0.00205	123.00	0.06	0.12
NO <sub>x</sub>	0.031	1860.00	0.93	1.86
CO	0.00668	400.80	0.20	0.40
TOC	0.0025141	150.85	0.08	0.15

**WELDING EMISSIONS**

ELECTRODE TYPE	CONSUMED LBS	HAP EMISSION FACTOR(.1LB/1000LB OF				MSDS %				Emission Factor Source
		CR(VI)	Mn	Ni	Pb	CR(VI)	Mn	Ni	Cu	
<b>SMAW</b>										
E6010	4200	0.01	9.91	0.04						AP-42
<b>GMAW</b>										
E70S	2200						2			SDAPCD Factors
<b>GTAW</b>										
ER70S-2	525					0.12	1.2		0.2	SDAPCD Factors
<b>SAW</b>										
EM12K	132000						1		0.5	SDAPCD Factors

FACTORS OBTAINED FROM EITHER AP42 OR SAN DIEGO AIR POLLUTION CONTROL DISTRICT

**POUNDS EMITTED**

	PM <sub>10</sub>	CR(VI)	Mn	Ni	Cu
E6010	107.52		4.326	0.0084	
E70S	22		0		
ER70S-2	5.25	6.56E-06	6.56E-05		1.09E-05
EM12K	6.6		0.018909		
<b>TOTAL</b>	<b>33.85</b>	<b>6.56E-06</b>	<b>0.018975</b>	<b>0</b>	<b>1.09E-05</b>

Welding can occur anytime during a 60 hour period per week. Welding occurs both inside a warehouse and out on the yard. Welding consumable usages based upon twice the actual usage in 2006.

Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	34	0.01	0.02
Mn	0	0.00	0.00
Ni	0	0.00	0.00



**CUTTING EMISSIONS**

New Industries utilizes several forms of cutting including a plasma table. Most cutting operations occur inside a warehouse. Cutting operations can occur any time of day, 60 hours per week.

**OXYMETHANE CUTTING**

Steel Cut: 1000000 ft

Pollutant	Emission Factor	Source
PM <sub>10</sub>	0.037 g/in	Section 313 Reporting: Clarification and Guidance for Metal Fabrication Industry
Ni	0.5 lb/MMft	
Cr	0.2 lb/MMft	
Mn	2.9 lb/MMft	

Propane: 1500 gal

Pollutant	Emission Factor	Source
PM <sub>10</sub>	0.4 lb/1000 gal	AP-42
SO <sub>x</sub>	neg	AP-42; clean fuel
NO <sub>x</sub>	1.4 lb/1000 gal	AP-42
CO	1.9 lb/1000 gal	AP-42
VOC	0.5 lb/1000 gal	AP-42

Natural Gas: 3 MMCF

Pollutant	Emission Factor	Source
PM <sub>10</sub>	7.6 lb/MMCF	AP-42
SO <sub>x</sub>	0.6 lb/MMCF	AP-42
NO <sub>x</sub>	94 lb/MMCF	AP-42
CO	40 lb/MMCF	AP-42
VOC	5.5 lb/MMCF	AP-42

Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	1001	0.32	0.50
Mn	2.9	0.00	0.001
Ni	0.5	0.00	0.000
Cr	0.2	0.00	0.000
SO <sub>x</sub>	1.8	0.00	0.001
NO <sub>x</sub>	303	0.10	0.152
CO	122.85	0.04	0.061
VOC	17.25	0.01	0.0086

**PLASMA TABLE CUTTING**

Two plasma cutting table are used at New Industries. Each is operated approximately 800 hours each annually

Hours Used: 1600 yr

Pollutant	Emission Factor	Source
PM <sub>10</sub>	1.6 lb/hr	Hydrotherm Emission Factors, worst case senario of cutting stainless steel
Mn	0.0615 lb/hr	
Ni	0.019 lb/hr	
Cr	0.0426 lb/hr	
NO <sub>x</sub>	0.373 lb/hr	



Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	2560	1.60	1.28
Mn	98	0.06	0.05
Ni	30	0.02	0.02
Cr	68	0.04	0.03
NO <sub>x</sub>	597	0.37	0.30

**Insignificant Point Source (LAC33.III.501.b-5)**

This facility has a 500 gallon and 250 gallon diesel tank onsite to fuel equipment. This tank falls below the 10,000 gallon threshold for organic liquids with a vapor pressure less than 0.5 psia. Diesel has a vapor pressure of 0.009 psia.





**Appendix D**  
**Housekeeping Plan**

## New Industries Housekeeping Plan

New Industries has developed and instituted a written plan to prevent or minimize volatile organic (VOC) emissions at its New Iberia facility. This plan satisfies the Louisiana Department of Environmental Quality's (LDEQ) requirement for the development of a written housekeeping plan.

Guidelines outlined in this plan should be reviewed with appropriate employees to assist personnel in practicing "good housekeeping and maintenance" to reduce the quantity of organic compound emissions from the facility.

Copies of this plan should be prominently posted throughout the facility. An additional copy of it should be placed in the facility permit file where it can be readily accessed by an LDEQ inspector.

VOCs are defined as hydrocarbons heavier than methane and ethane. Some typical examples of VOC emissions are the vapors that escape from an open can of paint or solvent, etc. Since our corporate policy is to have a minimal impact on the environment, we have defined "good housekeeping practices" to include the following:

1. Keep all containers that store volatile materials tightly sealed when not in use.
2. Prevent spills wherever possible. Should one occur, clean it up immediately. Eliminate or minimize evaporation from spills.
3. Store dirty rags used to clean up spills in a closed container until they can be properly disposed.
4. Store volatile waste materials in sealed containers.

**Appendix E**  
**Certificate of Good Standing**

**Louisiana Secretary of State  
Detailed Record**

Charter/Organization ID: 34301046F

Name: NEW INDUSTRIES, INC.

Prior Name: NEW OFFSHORE, INC. ( 1/26/2007)

Type Entity: Business Corporation (Non-Louisiana)

Status: Active

Annual Report Status: In Good Standing

Last Report Filed on 02/22/2007

Mailing Address: 6032 RAILROAD AVE, MORGAN CITY, LA 70380

Domicile Address: 1216 BECK AVE, PANAMA CITY, FL 32401

Principal Office: 6032 RAILROAD AVENUE, MORGAN CITY, LA 70380

Principal Bus. Est. in Louisiana: 6032 RAILROAD AVENUE, MORGAN CITY, LA 70380

Qualified: 03/25/1988

Registered Agent (Appointed 2/24/1992): WILLIAM C. NEW, 6032 RAILROAD AVENUE,  
MORGAN CITY, LA 70380

President: WILLIAM C NEW, 414 JACOBS STREET, BERWICK, LA 70342

Secretary: CYNTHIA T. NEW, 414 JACOBS STREET, BERWICK, LA 70342

**Amendments on File**

NAME CHANGE (01/26/2007)

STMT OF CHG OR CHG PRIN BUS OFF (FOREIGN (02/24/1992)





PRESSURE VESSELS – PIPING  
STRUCTURAL STEEL

COPY

original to LOA  
BW MFG/Sp2/Shannon  
Pusateri

December 5, 2007

Shannon Pusateri  
Department of Environmental Quality  
Air Permits Division  
P.O. Box 4313  
Baton Rouge, LA 70821-4313

RE: New Industries, Inc.  
AI: 30604  
Request for Additional Information  
Activity Number: PER20020001

RECEIVED

DEC 10 2007

DEPT. OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL SERVICES  
PERMIT DIVISION

Dear Ms. Pusateri,

This letter serves to address your request for additional information on the updated air permit application we submitted to LDEQ in October.

Concern:

- 1a. The permit application should include copies of the information source used to calculate volatile organic compound and toxic compound emissions from source 01-99.

Response:

Our consultant, Ms. Leah Roger, after speaking with you concerning the request for additional information, forwarded several email links to various paint manufacturers. She utilizes the MSDS and product data sheets off of the internet when estimating the air emissions.

New Industries

AI: 30604

Request Additional Information

Page 2

Concern:

- 1b. The calculations for sandblasting must include a description of the type of containment and information on how the containment efficiency was derived.

Response:

We are currently building a paint and blast building. This building will be enclosed with sheet metal on two sides and the roof and will have screens on the remaining two sides. Since the building will have a roof and four sides, the containment efficiency should be at least 75%. Since the emission estimates from blasting were based upon 50% containment utilizing only screens, the EIQ sheet has been updated and is attached.

Concern:

1. The calculations for paint particulate emissions list the total weight of paint sprayed as 53.66 tons. However, the paint weight calculated from the TAPs table is 62.44 tons. Please clarify the weight of paint sprayed and adjust emissions as necessary.

Response:

The weight of paint sprayed, as presented in the application, is 53.66 tons. The total weight of all paint, thinner, and solvent is 62.44 tons.

Concern:

2. The permit application must provide the basis for particulate emissions calculated for source 01-99.

New Industries

AI: 30604

Request Additional Information

Page 3

**Response:**

Paint particulate emissions are based upon an industry average standard of 3% off-site overspray. This estimate is based upon the spray gun transfer efficiency (approximately 75%), the solids content of the paint (approximately 75%), and the containment efficiency (75%). As well, some of the solids end up as hazardous waste (approximately 35 %). When multiplied, these factors yield the overspray loss factor of approximately 3%.

**Concern:**

3. The permit application must include copies of the information source used to calculate toxic emissions from welding electrodes.

**Response:**

As per your conversation with Ms. Roger, you agreed that the welding emissions were insignificant and that MSDS would not be needed for all of the electrodes. The MSDS information for the electrodes is available on the internet.

**Concern:**

4. The facility indicates that it will abide with the limits of LAC33.III.2123.C-11 to demonstrate compliance with the VOC emission rates. The coating information provided indicates that several of the paints have VOC densities above this amount. The facility must provide information on solvents, thinners, etc. that will be used to ensure compliance with LAC33.III.2123.C-11.

New Industries

AI: 30604

Request Additional Information

Page 4

**Response:**

Attached, please find a spreadsheet that summarizes the actual VOC content of each paint used at New Industries along with the allowable limit for each paint as dictated in LAC33.III.2123.C-11. As you will note, New Industries, according to the limits in LAC33.III.2123.C-11, may emit up to 13.47 tons/yr of VOC from painting. Since the company will only emit 10.87 tons/yr of VOC from listed paints and added thinners, they are in compliance with LAC33.III.2123.C-11.

**Concern:**

5. The facility must provide sufficient information to demonstrate compliance with the requirements of LAC33.III.Chapter 13, Subpart F - Abrasive Blasting.

**Response:**

LAC33.III.Chapter 13, Subpart F - Abrasive Blasting was promulgated in May 2007. New Industries has until May 2008 to comply with the requirements. At that time, we will be happy to provide sufficient information to demonstrate compliance with the rule.

**Concern:**

6. The facility must address applicability of and compliance with LAC33.III.2125 with respect to cleaning of spray guns, surface prep of metals, etc.

New Industries

AI: 30604

Request Additional Information

Page 5

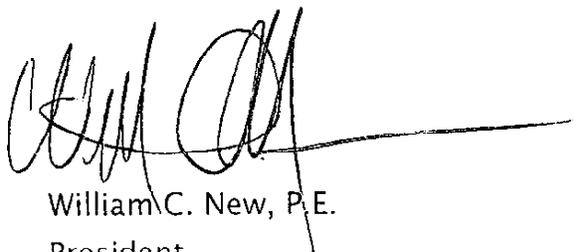
Response:

New Industries does not utilize nor own a vapor degreaser. As such, LAC33.III.2125 is not applicable to our facility.

I trust that the above information and associated attachments will sufficiently address your questions. If you have any more questions or need additional information, please feel free to contact me at 985-385-6789.

*I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete.*

Respectfully Submitted,



William C. New, P.E.  
President

**New Industries  
Morgan City, LA  
Air Emission Estimations**

**PAINT PARTICULATE EMISSIONS**

A 3% loss of paint due to overspray was assumed based upon the transfer efficiency of the spray guns, the containment efficiency, and the size of the yard. The total weight of paint sprayed was 53.66 tons; the particulate releases are assumed to be 1.6 tpy.

**SANDBLASTING EMISSIONS**

Sandblasting is done outdoors within a screened area anytime during a 12 hour period per day, five days per week.

annual amount sand used: 1 200 tons  
 containment efficiency: 75 %  
 emission factor: 26 lb/ton sand blasted \*

PM<sub>10</sub>: 3.9 tons/yr  
 3.00 lb/hr

**DIESEL ENGINE EMISSIONS**

One 230 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	230 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
<b>Pollutant</b>	<b>AP-42</b>	<b>Total Emitted</b>		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	1315.60	0.66	0.51
SO <sub>x</sub>	0.00205	1225.90	0.61	0.47
NO <sub>x</sub>	0.031	18538.00	9.27	7.13
CO	0.00668	3994.64	2.00	1.54
TOC	0.0025141	1503.43	0.75	0.58

One rental 109 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	109 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
<b>Pollutant</b>	<b>AP-42</b>	<b>Total Emitted</b>		
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	623.48	0.31	0.24
SO <sub>x</sub>	0.00205	580.97	0.29	0.22
NO <sub>x</sub>	0.031	8785.40	4.39	3.38
CO	0.00668	1893.11	0.95	0.73
TOC	0.0025141	712.50	0.36	0.27



One rental 70 hp diesel air compressor will be used 2600 hours per year on average.

horsepower rating compressor:	70 hp			
annual operation:	2600 hours			
emission factors:	AP-42			
Pollutant	AP-42		Total Emitted	
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	400.40	0.20	0.15
SO <sub>x</sub>	0.00205	373.10	0.19	0.14
NO <sub>x</sub>	0.031	5642.00	2.82	2.17
CO	0.00668	1215.76	0.61	0.47
TOC	0.0025141	457.57	0.23	0.18

One 60 hp welding machine will be used 1000 hours per year on average.

horsepower rating compressor:	60 hp			
annual operation:	1000 hours			
emission factors:	AP-42			
Pollutant	AP-42		Total Emitted	
	(lb/hp-hr)	(lb/yr)	(tons/yr)	(lb/hr)
PM <sub>10</sub>	0.0022	132.00	0.07	0.13
SO <sub>x</sub>	0.00205	123.00	0.06	0.12
NO <sub>x</sub>	0.031	1860.00	0.93	1.86
CO	0.00668	400.80	0.20	0.40
TOC	0.0025141	150.85	0.08	0.15

**WELDING EMISSIONS**

ELECTRODE TYPE	CONSUMED LBS	HAP EMISSION FACTOR (.1LB/1000LB OF				MSDS %				Emission Factor Source
		CR(VI)	Mn	Ni	Pb	CR(VI)	Mn	Ni	Cu	
<b>SMAW</b>										
E6010	4200	0.01	9.91	0.04						AP-42
<b>GMAW</b>										
E70S	2200						2			SDAPCD Factors
<b>GTAW</b>										
ER70S-2	525					0.12	1.2		0.2	SDAPCD Factors
<b>SAW</b>										
EM12K	132000						1		0.5	SDAPCD Factors

FACTORS OBTAINED FROM EITHER AP42 OR SAN DIEGO AIR POLLUTION CONTROL DISTRICT

	POUNDS EMITTED				
	PM <sub>10</sub>	CR(VI)	Mn	Ni	Cu
E6010	107.52		4.326	0.0084	
E70S	22		0		
ER70S-2	5.25	6.56E-06	6.56E-05		1.09E-05
EM12K	6.6		0.018909		
<b>TOTAL</b>	<b>33.85</b>	<b>6.56E-06</b>	<b>0.018975</b>	<b>0</b>	<b>1.09E-05</b>

Welding can occur anytime during a 60 hour period per week. Welding occurs both inside a warehouse and out on the yard. Welding consumable usages based upon twice the actual usage in 2006.

Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	34	0.01	0.02
Mn	0	0.00	0.00
Ni	0	0.00	0.00



**CUTTING EMISSIONS**

New Industries utilizes several forms of cutting including a plasma table. Most cutting operations occur inside a warehouse. Cutting operations can occur any time of day, 60 hours per week.

**OXYMETHANE CUTTING**

Steel Cut: 1000000 ft

Pollutant	Emission Factor	Source
PM <sub>10</sub>	0.037 g/in	Section 313 Reporting: Clarification and Guidance for Metal Fabrication Industry
Ni	0.5 lb/MMft	
Cr	0.2 lb/MMft	
Mn	2.9 lb/MMft	

Propane: 1500 gal

Pollutant	Emission Factor	Source
PM <sub>10</sub>	0.4 lb/1000 gal	AP-42
SO <sub>x</sub>	neg	AP-42; clean fuel
NO <sub>x</sub>	1.4 lb/1000 gal	AP-42
CO	1.9 lb/1000 gal	AP-42
VOC	0.5 lb/1000 gal	AP-42

Natural Gas: 3 MMCF

Pollutant	Emission Factor	Source
PM <sub>10</sub>	7.6 lb/MMCF	AP-42
SO <sub>x</sub>	0.6 lb/MMCF	AP-42
NO <sub>x</sub>	9.4 lb/MMCF	AP-42
CO	40 lb/MMCF	AP-42
VOC	5.5 lb/MMCF	AP-42

Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	1001	0.32	0.50
Mn	2.9	0.00	0.001
Ni	0.5	0.00	0.000
Cr	0.2	0.00	0.000
SO <sub>x</sub>	1.8	0.00	0.001
NO <sub>x</sub>	303	0.10	0.152
CO	122.85	0.04	0.061
VOC	17.25	0.01	0.0086

**PLASMA TABLE CUTTING**

Two plasma cutting table are used at New Industries. Each is operated approximately 800 hours each annually

Hours Used: 1600 yr

Pollutant	Emission Factor	Source
PM <sub>10</sub>	1.6 lb/hr	Hydrotherm Emission Factors, worst case scenario of cutting stainless steel
Mn	0.0615 lb/hr	
Ni	0.019 lb/hr	
Cr	0.0426 lb/hr	
NO <sub>x</sub>	0.373 lb/hr	



**New Offshore  
2123 Compliance Table**

Point		Amount	Density	Actual VOC Content	2123.C-11 Limit	Allowable VOC	Actual VOC
Manufacturer	Name	gal	lbs/gal	lbs/gal	lbs/gal	lbs	lbs
Carboline	CZ-11	560	23.50	4	5.41	3029.6	2240
Carboline	890	180	12.65	1.7	3.5	630	306
Ameron	235	170	11.05	2.4	3.5	595	408
Ameron	450 HS	300	9.66	2.6	3.5	1050	780
Ameron	385	550	11.80	2.3	3.5	1925	1265
Ameron	68 HS	50	27.60	2.4	3.5	175	120
Ameron	D-9	225	20.03	4.1	5.41	1217.25	922.5
Ameron	78 HB	150	12.90	1.9	3.5	525	285
International	Interline 359	700	14.50	3	3.5	2450	2100
International	264	2450	13.20	1.62	3.5	8575	3969
Jones Blair	Chem-o-z-organic	1250	24.24	3.4	5.41	6762.5	4250
Carboline	#25	150	7.40	7.4	0	0	1110
Ameron	#65	350	7.30	7.4	0	0	2590
Ameron	T-10	200	6.96	6.96	0	0	1392
<b>TOTAL:</b>		<b>9085 gal</b>				<b>26934.35</b>	<b>21737.5</b>
			(TPY)			<b>13.47</b>	<b>10.87</b>

Since the actual VOC from the paint and thinners is less the allowable VOC per 2123.C-11, the facility is in compliance with the Organic Solvent Subchapter.



Pollutant	Releases		
	lb/yr	lb/hr	tpy
PM <sub>10</sub>	2560	1.60	1.28
Mn	98	0.06	0.05
Ni	30	0.02	0.02
Cr	68	0.04	0.03
NO <sub>x</sub>	597	0.37	0.30

**Insignificant Point Source (LAC33.III.501.b-5)**

This facility has a 500 gallon and 250 gallon diesel tank onsite to fuel equipment. This tank falls below the 10,000 gallon threshold for organic liquids with a vapor pressure less than 0.5 psia. Diesel has a vapor pressure of 0.009 psia.





BOBBY JINDAL  
Governor



HAROLD LEGGETT, PH.D.  
Secretary

Louisiana Department of Environmental Quality  
Office of Environmental Services

Certified Mail No.:

Activity No.: PER20020001  
Agency Interest No.: 30604

Mr. William New  
President  
New Industries, Inc.  
P.O. Box 2176  
Morgan City, LA 70381

RE: Permit, New Industries, Inc.  
Morgan City, St. Mary Parish, Louisiana

Dear Mr. New:

This is to inform you that the permit request for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets, and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Also enclosed is a document entitled "General Information." Please be advised that this document contains a summary of facility-level information contained in LDEQ's TEMPO database and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to [facupdate@la.gov](mailto:facupdate@la.gov).

The permit number cited below and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

Permit No.: 2660-00232-01

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary  
CSP:sfp

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**New Industries, Inc.**  
**Agency Interest No.: 30604**  
**Morgan City, St. Mary Parish, Louisiana**

**I. BACKGROUND**

New Industries, Inc., an existing facility began operation in March 1999. New Industries, Inc. currently operates under Permit No. 2660-00232-00, issued January 28, 2000.

**II. ORIGIN**

A permit application and Emission Inventory Questionnaire were submitted by New Offshore, Inc. on November 15, 2002 requesting a minor modification to the permit. Additional information dated October 19, 2007 and December 5, 2007 was also received.

**III. DESCRIPTION**

New Industries sandblasts and paints equipment per customer specifications. Air emissions generated are typically from painting, general solvent use and sandblasting. These activities occur in vented warehouses and outdoors.

With this modification, New Industries, Inc. proposes to increase emission rates due to an increase in production rates and to establish an emissions cap on the TAP emissions to allow for operational flexibility.

Estimated emissions from this facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	4.87	12.44	+7.57
SO <sub>2</sub>	0.18	1.15	+0.97
NO <sub>x</sub>	2.91	17.86	+14.95
CO	1.15	3.82	+2.67
VOC	1.98	15.90	+13.92

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year*	LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year*
<b>VOC TAPs</b>		<b>Non-VOC TAPs</b>	
Benzene	<0.10	Barium(and Compounds)	<1.00
n-Butyl Alcohol	<5.50	Zinc(and compounds)	<1.00
Ethyl Benzene	<9.00		
Formaldehyde	<0.10		
Glycol Ethers	<0.50		
Hexamethylene diisocyanate	<1.00		
n-Hexane	<6.50		

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**New Industries, Inc.**  
**Agency Interest No.: 30604**  
**Morgan City, St. Mary Parish, Louisiana**

LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year*	LAC 33:III. Chapter 51 Toxic Air Pollutants TAP's	Emissions in Tons per year*
Methanol	<9.00		
Methyl Ethyl Ketone	<9.00		
Methyl Isobutyl Ketone	<7.50		
Napthalene	<1.00		
Phenol	<0.70		
Styrene	<1.00		
Toluene	<9.00		
Trichloroethylene	<1.00		
Xylene	<9.00		
Total TAP's	6.42		
Other VOC's	9.65		
<b>Total VOC</b>	<b>15.90</b>		

\* These are facility wide caps on the TAP/HAP emissions. Aggregate toxic air pollutants (TAP) emissions shall be limited to no more than 6.42 tons/yr. The facility shall use materials which contain only the TAPs listed in this table.

#### IV. TYPE OF REVIEW

This permit was reviewed for compliance with Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD) and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).

#### V. PUBLIC NOTICE

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

#### VI. EFFECTS ON AMBIENT AIR

Dispersion Model(s) Used: <None>

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Ambient Air Quality Standard (NAAQS)

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**New Industries, Inc.**  
**Agency Interest No.: 30604**  
**Morgan City, St. Mary Parish, Louisiana**

**VII. GENERAL CONDITION XVII ACTIVITIES**

Work Activity	Schedule	PM <sub>10</sub>	Emission Rates - tons			
			SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
None						

**VIII. INSIGNIFICANT ACTIVITIES**

ID No.:	Description	Citation
-	500 gal Diesel Tank	LAC33.III.501.B.5.A.3
-	250 gal Diesel Tank	LAC33.III.501.B.5.A.3

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated November 15, 2002 requesting a minor modification to the operating permit, along with supplemental information dated October 19, 2007 and December 5, 2007.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    1. Report by June 30 to cover January through March
    2. Report by September 30 to cover April through June
    3. Report by December 31 to cover July through September
    4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
  - 1. Description of noncomplying emission(s);
  - 2. Cause of noncompliance;
  - 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  - 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  - 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
  
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

**General Information**

AI ID: 30604 New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

ID	Name	User Group	Start Date
2660-00232	New Offshore Inc	CDS Number	08-05-2002
LAR000034850	New Offshore Inc	Hazardous Waste Notification	03-10-1999
LAG480303	LPDES #	LPDES Permit #	09-30-2003
30624	New Offshore Inc	TEMPO Merge	01-15-2001
70380NWF56032R	TRI #	Toxic Release Inventory	07-13-2004

**Physical Location:**

6032 Railroad Ave  
 (portion of)  
 Morgan City, LA 70380

**Mailing Address:**

6032 Railroad Ave  
 Morgan City, LA 70380

**Location of Front Gate:** 29° 41' 22" 66 hundredths latitude, 91° 10' 15" 97 hundredths longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD83

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
William New	6032 Railroad Ave Morgan City, LA 70380		Employed by

**Related Organizations:**

Name	Address	Phone (Type)	Relationship
New Offshore Inc	6032 Railroad Ave Morgan City, LA 70380		Air Billing Party for

**Note:** This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

**INVENTORIES**

**AI ID: 30604 - New Industries**  
**Activity Number: PER20020001**  
**Permit Number: 2660-00232-01**  
**Air - Minor Source/Small Source Mod**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Entire Facility</b>						
ARE0001	1-99 - Paint and Thinner Emissions		7285 gallons/yr	7285 gallons/yr		3120 hr/yr (All Year)
ARE0002	2-99 - Solvent Emissions		1800 gallons/yr	1800 gallons/yr		3120 hr/yr (All Year)
ARE0003	3-99 - Sandblasting Emissions		1200 tons/yr	1200 tons/yr		3120 hr/yr (All Year)
ARE0004	13-99 - Welding & Cutting Emissions		13900 lb/yr	69500 lb/yr		3120 hr/yr (All Year)
EQT0001	4-99 - Diesel Air Compressor		230 horsepower	230 horsepower		3120 hr/yr (All Year)
EQT0002	5-99 - Diesel Air Compressor		70 horsepower	70 horsepower		3120 hr/yr (All Year)
EQT0004	10-99 - Diesel Welding Machine		60 horsepower	60 horsepower		1000 hr/yr (All Year)
EQT0005	14-99 - Diesel Air Compressor		109 horsepower	109 horsepower		3120 hr/yr (All Year)

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Entire Facility</b>							
EQT0001	4-99 - Diesel Air Compressor				.29	8	
EQT0002	5-99 - Diesel Air Compressor				.21	7	
EQT0005	14-99 - Diesel Air Compressor				.25	8	

**Relationships:**

**Subject Item Groups:**

ID	Group Type	Group Description
GRP0002	Equipment Group	
UNF0001	Unit or Facility Wide	

**Group Membership:**

ID	Description	Member of Groups
ARE0001	1-99 - Paint and Thinner Emissions	GRP000000000002
ARE0002	2-99 - Solvent Emissions	GRP000000000002

**NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group**

**Annual Maintenance Fee:**

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1722	Small Source Permit		

**SIC Codes:**

3479	Metal coating and allied services	AI30604
3479	Metal coating and allied services	UNF001

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 30604 - New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
Entire Facility															
ARE 0001 1-99															
ARE 0002 2-99								1.03						6.87	
ARE 0003 3-99							5.0	5.0	7.8					2.40	
ARE 0004 13-99	0.04	0.04	0.06	0.47	0.47	0.45	1.93	1.93	1.80	<0.001	<0.001	0.001	0.006	0.006	0.009
EQT 0001 4-99	0.12	0.12	2.0	0.57	0.57	9.27	0.04	0.04	0.66	0.04	0.04	0.61	0.05	0.05	0.75
EQT 0002 5-99	0.39	0.39	0.61	1.81	1.81	2.82	0.13	0.13	0.20	0.12	0.12	0.19	0.15	0.15	0.23
EQT 0004 10-99	0.40	0.40	0.20	1.86	1.86	0.93	0.14	0.14	0.07	0.12	0.12	0.06	0.16	0.16	0.08
EQT 0005 14-99	0.61	0.61	0.95	2.81	2.81	4.39	0.20	0.20	0.31	0.186	0.186	0.29	0.231	0.231	0.36
GRP 0002							1.03		1.60				9.27		14.47

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 30604 - New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
ARE 0001 1-99	Ethyl benzene		0.45	
	Hexamethylene diisocyanate		0.01	
	Methanol		0.16	
	Methyl isobutyl ketone		0.01	
	Toluene		0.02	
	Xylene (mixed isomers)		2.34	
	n-butyl alcohol		0.52	
ARE 0002 2-99	Ethyl benzene		0.08	
	Methyl isobutyl ketone		0.10	
	Toluene		0.04	
	Xylene (mixed isomers)		0.20	
ARE 0004 13-99	Chromium VI (and compounds)	0.04	0.04	0.03
	Manganese (and compounds)	0.06	0.06	0.05
	Nickel (and compounds)	0.02	0.02	0.02
GRP 0002	Ethyl benzene	0.53		0.84
	Hexamethylene diisocyanate	0.01		0.02
	Methanol	0.16		0.25
	Methyl isobutyl ketone	0.11		0.17
	Toluene	0.06		0.09
	Xylene (mixed isomers)	2.54		3.96
	n-butyl alcohol	0.52		0.82
UNF 0001	Chromium VI (and compounds)			0.03
	Ethyl benzene			0.832
	Hexamethylene diisocyanate			0.023
	Manganese (and compounds)			0.05
	Methanol			0.250
	Methyl isobutyl ketone			0.170
	Toluene			0.094
	Xylene (mixed isomers)			3.964
	Zinc (and compounds)			0.17
	n-butyl alcohol			0.817

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**SPECIFIC REQUIREMENTS**

AI ID: 30604 - New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

**ARE0001 1-99 - Paint and Thinner Emissions**

- 1 [LAC 33:III.2123.C] VOC, Total: Comply with the VOC emission limitations (lbs/gal of coating as applied minus water and exempt solvent) as specified in LAC 33:III.2123.C11.b, Surface Coating for Marine Vessels and Oilfield Tubulars and Ancillary Oilfield Equipment.
- 2 [LAC 33:III.2123.E] Determine compliance with LAC 33:III.2123.A, C, and D by applying the test methods specified in LAC 33:III.2123.E.1 through E.6, as appropriate.
- 3 [LAC 33:III.2123.F] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2123.F.1 through F.4 to verify compliance with LAC 33:III.2123. Maintain records for at least two years.
- 4 [LAC 33:III.2123.H] Comply with the requirements of LAC 33:III.2123 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2123 as a result of a revision of LAC 33:III.2123.

**ARE0002 2-99 - Solvent Emissions**

- 5 [LAC 33:III.2123.C] VOC, Total: Comply with the VOC emission limitations (lbs/gal of coating as applied minus water and exempt solvent) as specified in LAC 33:III.2123.C11.b, Surface Coating for Marine Vessels and Oilfield Tubulars and Ancillary Oilfield Equipment.
- 6 [LAC 33:III.2123.E] Determine compliance with LAC 33:III.2123.A, C, and D by applying the test methods specified in LAC 33:III.2123.E.1 through E.6, as appropriate.
- 7 [LAC 33:III.2123.F] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2123.F.1 through F.4 to verify compliance with LAC 33:III.2123. Maintain records for at least two years.
- 8 [LAC 33:III.2123.H] Comply with the requirements of LAC 33:III.2123 as soon as practicable, but in no event later than one year from the promulgation of the regulation revision, if subject to LAC 33:III.2123 as a result of a revision of LAC 33:III.2123.

**ARE0003 3-99 - Sandblasting Emissions**

- 9 [LAC 33:III.1327.A.1] Do not use material derived from hazardous, toxic, medical, and/or municipal waste as abrasive material. Effective May 20, 2008.
- 10 [LAC 33:III.1327.A.2] Particulate matter fines < 10 % by weight of the abrasive that would pass through a No. 80 sieve as documented by the supplier. If supplier documentation is not provided for weight percent of fines in abrasive material, take samples according to ASTM standard ASTM D 75-87, reapproved 1992, before initial use. Effective May 20, 2008.  
Which Months: All Year Statistical Basis: None specified
- 11 [LAC 33:III.1327.A.3] Do not reuse abrasives for abrasive blasting unless they meet the requirements of LAC 33:III.1327.A.2. Effective May 20, 2008.
- 12 [LAC 33:III.1329.A.2] Prepare and implement a best management practices (BMP) plan as described in LAC 33:III.1331. Effective May 20, 2008.
- 13 [LAC 33:III.1329.B] Re-circulate blast cabinet exhaust to the cabinet or vent to emission control equipment. Effective May 20, 2008.
- 14 [LAC 33:III.1329.F] Ensure that abrasive blasting activities do not create a nuisance. Effective May 20, 2008.
- 15 [LAC 33:III.1329.G] Maintain stockpiles of new and/or spent abrasive material in a manner that will minimize fugitive airborne emissions. Effective May 20, 2008.
- 16 [LAC 33:III.1329.H] Use and diligently maintain all emission control equipment in proper working order according to the manufacturer's specifications whenever any emissions are being generated that can be controlled by the facility, even if the ambient air quality standard in affected areas are not exceeded. Effective May 20, 2008.
- 17 [LAC 33:III.1331.B] Keep a complete copy of the BMP plan at the facility and make available to authorized representatives of DEQ upon request. Submit plans to DEQ if requested by an authorized representative of DEQ. Effective May 20, 2008.

**SPECIFIC REQUIREMENTS**

**AI ID: 30604 - New Industries**  
**Activity Number: PER20020001**  
**Permit Number: 2660-00232-01**  
**Air - Minor Source/Small Source Mod**

**ARE0003 3-99 - Sandblasting Emissions**

- 18 [LAC 33:III.1331.C] Designate a person who is accountable for the implementation and effectiveness of the BMP plan. Effective May 20, 2008.
- 19 [LAC 33:III.1331.D] Amend the BMP plan if required to by DEQ or whenever physical or operational modification of the facility renders the existing plan inadequate. Implement the amendment prior to or concurrent with the facility modification. Effective May 20, 2008.
- 20 [LAC 33:III.1331.E] Review the BMP plan every three years to determine if the plan adequately reduces nuisances and adverse off-site impacts. If it is determined that the plan is not adequate, amend the plan within 90 days of the review to include more effective emission prevention and control technology. Effective May 20, 2008.
- 21 [LAC 33:III.1331.F] Prepare the BMP plan in accordance with sound engineering practices and ensure that it is site-specific. Present the plan information in the sequence specified in LAC 33:III.1331.F.1 through F.10. Effective May 20, 2008.
- 22 [LAC 33:III.1331.G] Include provisions for personnel training in the BMP plan as specified in LAC 33:III.1331.G.1 through G.4. Effective May 20, 2008.
- 23 [LAC 33:III.1331.H.1] Ensure that records of the three year review are signed or initiated by the person conducting the review and an appropriate supervisor or the facility designee. Retain for a minimum of three years. Effective May 20, 2008.
- 24 [LAC 33:III.1331.H.2] Maintain the following records on the facility premises: Self-inspection reports prepared in accordance with LAC 33:III.1331.F.8, and documentation of employee and contractor training, including dates, subjects, and hours of training and a list of attendees with signatures. Effective May 20, 2008.
- 25 [LAC 33:III.1333] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain the records specified in LAC 33:III.1333.A.1 through A.7 on the facility premises at all times. Present them to an authorized representative of DEQ upon request. Maintain records on a 36 month rolling basis. Effective May 20, 2008.

**ARE0004 13-99 - Welding & Cutting Emissions**

- 26 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.
- 27 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
Which Months: All Year Statistical Basis: Six-minute average
- 28 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

**EQI0001 4-99 - Diesel Air Compressor**

- 29 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
Which Months: All Year Statistical Basis: Six-minute average

**EQI0002 5-99 - Diesel Air Compressor**

**SPECIFIC REQUIREMENTS**

AI ID: 30604 - New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

**EQT0002 5-99 - Diesel Air Compressor**

30 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
 Which Months: All Year Statistical Basis: Six-minute average

**EQT0004 10-99 -Diesel Welding Machine**

31 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
 Which Months: All Year Statistical Basis: Six-minute average

**EQT0005 14-99 - Diesel Air Compressor**

32 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.  
 Which Months: All Year Statistical Basis: Six-minute average

**GRP0002 Paint and Thinner/Solvent Emissions**

Group Members: ARE0001 ARE0002

- 33 [LAC 33:III.2123] VOC, Total: Comply with the VOC emission limitations (lbs/gal of coating as applied minus water and exempt solvent) as specified in LAC 33:III.2123.C.11.b, Surface Coating for Marine Vessels and Oilfield Tubulars and Ancillary Oilfield Equipment.
- 34 [LAC 33:III.501.C.6] Aggregate toxic air pollutant (TAP) emissions shall be limited to no more than 6.42 tons per year, and the emissions of any single TAP shall be restricted to no more than the limit established in the "Emission Rates for TAP/HAP & Other Pollutants" or "Specific Requirements" sections of this permit. Emissions in excess of the limits specified for any 12 month consecutive period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.
- 35 [LAC 33:III.501.C.6] All records shall be kept on site for five (5) years and available for review by the Office of Environmental Compliance, Surveillance Division. The records shall provide the reference to the documentation which supports the paint/solvent composition used in the emission calculations.
- 36 [LAC 33:III.501.C.6] Daily weighted average VOC emissions. Equipment/operational data monitored by calculations monthly. Emissions reported in pounds per gallon coating as applied (minus water and exempt solvent).  
 Which Months: All Year Statistical Basis: Daily average  
 Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total calculated VOC and TAP emissions each month, as well as the total calculated VOC and TAP emissions for the last twelve months. The records shall provide the reference to the documentation which supports the paint/solvent composition used in the emissions calculation. Make records available for inspection by DEQ personnel.
- 37 [LAC 33:III.501.C.6]
- 38 [LAC 33:III.501.C.6] Permittee shall maintain a logbook showing monthly records of the type and amounts of paints used.
- 39 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March. Report the VOC and TAP emissions for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

**SPECIFIC REQUIREMENTS**

AI ID: 30604 - New Industries  
 Activity Number: PER20020001  
 Permit Number: 2660-00232-01  
 Air - Minor Source/Small Source Mod

**GRP002 Paint and Thinner/Solvent Emissions**

- 40 [LAC 33:III.501.C.6] The facility shall use materials which contain only the Toxic Air Pollutants (TAPs) established in the "Emission Rates for TAP/HAP & Other Pollutants" section of the Air Permit Briefing Sheet of this permit.
- 41 [LAC 33:III.501.C.6] Volatile organic compound (VOC) emissions shall be restricted to no more than the limit established in the "Emission Rates for Criteria Pollutants" section of this permit. Emissions in excess of the limits specified for any 12 month consecutive period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.

**UNF001 Entire Facility**

- 42 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 43 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 44 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 45 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 46 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 47 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 48 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 49 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.